

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In Re:	:
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DPH HOLDINGS CORP., et al.,	Chapter 11
	:
Reorganized Debtors.	Case No. 05-44481 (RDD)
	:
	(Jointly Administered)
	:
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ORDER SHORTENING NOTICE PERIOD FOR HEARING ON THE UNITED STATES' MOTION TO APPROVE THE JOINT STIPULATION AND AGREED ORDER, CONSENT DECREE AND SETTLEMENT AGREEMENT

Upon the motion (the “Motion”) of the United States of America on behalf of the U.S. Environmental Protection Agency (the “United States”) for entry of an order shortening the notice period for the hearing on the Joint Stipulation and Agreed Order, Consent Decree and Settlement Agreement (the “Settlement Agreement Approval Motion”); and it appearing that the relief requested is in the best interests of DPH Holdings Corporation and other parties in interest; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Motion having been adequate and appropriate under the circumstances; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Motion is granted to the extent provided herein.
2. The notice period otherwise applicable to a hearing on the Settlement Agreement Approval Motion is shortened pursuant to Bankruptcy Rule 9006(c)(1).

3. The deadline for the service and filing of any opposition to the Settlement Agreement Approval Motion shall be set to allow parties to raise objections on or before **December 6, 2013, at 12:00 p.m.**

4. In the event no opposition is filed before the above deadline, no hearing on the Settlement Agreement Approval Motion shall be held. If any opposition is filed, the Court will set a hearing date.

5. The United States is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

6. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

White Plains, New York
Date: December __, 2013

Hon. Robert D. Drain
United States Bankruptcy Judge